

FIFTH EVALUATION ROUND

Preventing corruption and promoting integrity in
central governments (top executive functions) and
law enforcement agencies

SECOND ADDENDUM TO THE SECOND COMPLIANCE REPORT

ICELAND

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Group of States against Corruption
Groupe d'États contre la corruption



I. INTRODUCTION

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (persons entrusted with top executive functions - PTEF) and law enforcement agencies (LEA)".
2. This Second Addendum to the Second Compliance Report assesses the measures taken by the authorities of Iceland to implement the recommendations issued in the Fifth Round Evaluation Report on Iceland which was adopted at GRECO's 79th Plenary Meeting (23 March 2018) and made public on 12 April 2018, following authorisation by Iceland. The corresponding Compliance Report was adopted by GRECO at its 86th Plenary Meeting (29 October 2020) and made public on 16 November 2020, following authorisation by Iceland. The Second Compliance Report was adopted by GRECO at its 92nd Plenary Meeting (2 December 2022) and made public on 6 December 2022, following authorisation by Iceland. The Addendum to the Second Compliance Report was adopted by GRECO at its 97th Plenary Meeting (21 June 2024) and made public on 1 August 2024, following authorisation by Iceland.
3. As required by GRECO's Rules of Procedure,¹ the authorities of Iceland submitted a Situation Report on measures taken to implement the recommendations contained in the Evaluation Report. This report was received on 3 July 2025 and, along with the additional information provided on 22 October 2025, served as a basis for this Addendum to the Second Compliance Report.
4. GRECO selected Denmark (with respect to top executive functions in central governments) and Latvia (with respect to law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Anders Dyrvig Rechendorff on behalf of Denmark, and Anna Ajošina on behalf of Latvia. They were assisted by GRECO's Secretariat in drawing up the Second Addendum to the Second Compliance Report.

II. ANALYSIS

5. GRECO, in its Fifth Round Evaluation Report, addressed eighteen recommendations to Iceland. In the Addendum to the Second Compliance Report, GRECO concluded recommendations i, iii-viii, x and xviii have been implemented satisfactorily or dealt with in a satisfactory manner, recommendations ii, ix, xi-xiii, xv-xvii have been partly implemented, and recommendation xiv has not been implemented. Compliance with the outstanding recommendations is dealt with below.

Preventing corruption and promoting integrity in central governments (top executive functions)

Recommendation ii

6. *GRECO recommended that (i) the codes of conduct for persons entrusted with top executive functions be harmonised or consolidated as the case may be, and*

¹ The Compliance procedure of GRECO's Fifth Evaluation Round is governed by its Rules of Procedure, as amended: Rule 31 revised bis and Rule 32 revised bis.

complemented with appropriate guidance, including explanatory comments and concrete examples, as well as with confidential counselling and (ii) a credible mechanism of supervision and sanctions be put in place.

7. It is recalled that this recommendation remained partly implemented in the Addendum to the Second Compliance Report. GRECO concluded that the first part of the recommendation had been complied with, as the two Codes of Ethics were revised and their applicability to the relevant categories of officials, including ministers and other PTEFs, was clarified. In addition, guiding and educational materials with specific examples were being developed to raise awareness of these Codes. However, no new information had been provided to illustrate the strengthening of the supervisory mechanism envisaging sanctions for violations of the Codes of Conduct.
8. The authorities of Iceland report that, under domestic law, the Parliamentary Ombudsman is responsible for overseeing the conduct of public administration, ensuring good administrative practices, and monitoring the codes of ethics applicable to members of government and public employees. In particular, the Ombudsman exercises oversight regarding the Codes of Conduct applicable to Ministers and other PTEFs, and breaches may result in a formal opinion identifying misconduct. The authorities reiterate that such opinions are public and may have reputational consequences.
9. GRECO takes note of the information provided by the authorities. The Ombudsman's role in receiving complaints regarding violations of the Ministerial Code of Conduct was already noted in the Evaluation Report. No further measures have been reported to enhance the supervisory and enforcement system, as required by the second part of the recommendation.
10. It is recalled that GRECO was concerned about the lack of sanctions for breaches of the Code. In this connection, the Icelandic authorities appear to maintain their position, expressed in previous compliance reports, that the sanctions contained in law are deemed sufficient, and adherence to the codes of conduct is subject to scrutiny by co-workers, the media and the public.
11. GRECO concludes that recommendation ii remains partly implemented.

Recommendation ix

12. *GRECO recommended strengthening the credibility of the registration system for declarations of financial interests in respect of persons exercising top executive functions, by ensuring greater adherence to the rules through a system of monitoring, providing adequate advice and guidance, and implementing a mechanism of sanction when requirements are not observed.*
13. It is recalled that this recommendation remained partly implemented in the Addendum to the Second Compliance Report. GRECO welcomed the adoption of the guidelines on the submission of declarations of financial interests by PTEFs. However, decisions on sanctions for violations of these rules by PTEFs remained the responsibility of the ministries and were still limited to "political responsibility" in the case of ministers.

14. The authorities of Iceland report that no decision has been taken yet regarding the introduction in law of specific sanctions for violations of declaratory obligations.
15. In the absence of any update, GRECO concludes that recommendation ix remains partly implemented.

Preventing corruption and promoting integrity in law enforcement agencies

Recommendation xi

16. *GRECO recommended that (i) the Codes of Conduct for the Police and the Icelandic Coast Guard be complemented to address more broadly conflicts of interest and political activities, and so as to offer practical guidance through explanatory comments and practical examples on all corruption-related subjects, as well as confidential counselling and (ii) a credible mechanism of supervision and sanctions be clearly provided for.*
17. GRECO recalls that this recommendation was partly implemented in the Addendum to the Second Compliance Report. GRECO welcomed the adoption of the revised Code of Conduct for the Police, setting out principles of ethical conduct and integrity and establishing that violations of the Code may give rise to disciplinary measures. GRECO also noted the comprehensive Integrity Review Policy, with its holistic approach to implementing the Code of Conduct, and the training of Police employees regarding its content. However, GRECO noted that the provisions of the Code did not define the principles it contained and did not require police officers to maintain political neutrality in their daily work. Further, the Code needed to be complemented with practical examples of how to act in specific situations. Finally, no new measures were reported regarding confidential counselling on ethics and integrity for police employees.
18. The authorities of Iceland indicate that the Code of Conduct for the Police has been updated and now includes definitions of its principles, as well as practical examples of how a police employee should act in specific situations. Furthermore, a provision has been added, requiring police officers to demonstrate political neutrality when carrying out official duties. The amended Code also explicitly states that when facing ethical issues at work, police officers can seek support either from more experienced colleagues, or from an independent psychologist from the network of psychologists maintained by the Icelandic Police.² The authorities consider that this creates a safe space for reflection with a neutral expert who can help clarify the right course of action in complex situations.
19. Finally, the authorities inform that an updated Code of Conduct for the Icelandic Coast Guard was adopted and published in June 2024. This Code contains clear practical examples of how Coast Guard staff are expected to act in specific circumstances.

² The authorities indicate that the Icelandic Police maintains a network of independent psychologists, licensed by the Directorate of Health, who offer confidential consultations to police officers on trauma and other work-related issues. The costs of these consultations are covered by the National Commissioner of Police. The psychologists of the network have completed an ethics course with the Icelandic Psychological Association and are bound by professional confidentiality rules.

20. GRECO takes note of the information provided by the authorities. It notes with satisfaction that the amendments to the Code of Conduct for the Police introduced an article-by-article guidance regarding the provisions of the Code, its basic principles, as well as the appropriate conduct when facing practical dilemmas.
21. With respect to confidential counselling, GRECO has some reservations about the current options, which include turning to "*experienced colleagues who are respected within the police*" or to "*an independent psychologist for confidential discussion*". Involving external parties in police matters may pose risks to the confidentiality of sensitive information, even if they are bound by respective professional confidentiality rules. Additionally, while psychologists may have followed ethics training in their respective domain, their familiarity with the Police Code of Conduct and the specific challenges police personnel face would still be limited, which could affect the relevance of their advice on police ethics. Against this background, GRECO refers to its established jurisprudence emphasising the importance of providing officers with confidential, free-of-charge counselling from qualified professionals, outside the chain of command, to ensure both expertise and consistency in approach.
22. Further, while welcoming the adoption of the Code of Conduct for the Icelandic Coast Guard, GRECO notes that it does not offer confidential counselling opportunities, and does not include detailed guidance on its provisions.³ In light of these shortcomings, and in spite of the progress recognised by GRECO, this recommendation cannot be seen as fully complied with.
23. GRECO concludes that recommendation xi remains partly implemented.

Recommendation xii

24. *GRECO recommended that regular training programmes and awareness raising measures on integrity and professional ethics be developed (covering conflicts of interest and other corruption prevention-related matters) for law enforcement bodies, taking into consideration their specificity, the variety of duties and their vulnerabilities.*
25. It is recalled that this recommendation remained partly implemented in the Addendum to the Second Compliance Report. GRECO noted the plan to transfer training activities to the Police Training and Professional Development Centre and the intention to develop a dedicated integrity training programme, including induction and annual in-service training under the Integrity Review Policy Document. However, these measures had not yet been implemented. Further, no information was provided on the number of ethics and integrity training sessions conducted for Coast Guard staff.
26. The authorities of Iceland now inform that, as part of the continuing professional development of police staff, training on ethics and the Code of Conduct is systematically integrated into formal and informal learning activities. By way of example, the authorities refer to the annual leadership training programme for shift supervisors (26 officers participating each year), which includes a two-hour module on police ethics and professional conduct. Similarly, the specialised annual course on criminal

³ While Appendix I of the Code of Conduct of the Icelandic Coast Guard includes certain self-reflection questions for employees, these questions alone are insufficient to provide the necessary guidance.

investigations includes two hours of dedicated instruction on ethical standards, reaching approximately 29 participants per training. In addition, four educational videos addressing corruption and ethical challenges, mandatory for those enrolled in advanced training programmes, are available on the Police Intranet. Issues related to ethics are also embedded in other specialised training modules, such as the course on drug crime investigations, which contains the subject of ethical decision-making and adherence to the Code of Conduct.

27. Furthermore, the authorities submit that education on ethics is a core component of the programme for prospective police officers at the University of Akureyri. The first semester module entitled "The Police Profession" introduces the Police Code of Ethics and fosters discussion on practical ethical dilemmas that may arise in operational contexts.⁴ The second semester includes the module on "Professional Ethics in Law and Policing", focussing on ethical theory and its application to complex decision-making in policing and legal contexts.⁵ Reflections on ethics are also integrated into the practical Police Training modules, ensuring continuous engagement with questions of professional conduct and integrity when developing policing skills.⁶
28. Finally, the authorities report that a broad range of training materials⁷ is also provided to new employees of the Icelandic Coast Guard, including the Code of Ethics and Rules of Conduct. In particular, they indicate that all new employees undergo an onboarding programme, consisting of five core modules,⁸ delivered through the electronic learning management system. At present, onboarding programme has been completed by 32

⁴ Course description is accessible via the following link: <https://ugla.unak.is/kennsluskra/index.php?tab=nam&chapter=namskeid&id=86390920256&namskra=1>

⁵ Course description is accessible via the following link: <https://ugla.unak.is/kennsluskra/index.php?tab=nam&chapter=namskeid&id=86256620270&namskra=1>

⁶ Programme description can be consulted via the following link: https://ugla.unak.is/kennsluskra/index.php?tab=nam&chapter=namsleid&id=640133_20256&namskra=1&ken_nsluar=2025

⁷ In particular, the authorities indicate that the following educational package is provided to new recruits through the Coast Guard School:

1. General Introduction Materials; Introductory videos about the operations of the Coast Guard;
2. Human Resources Department; Introduction Materials; Introductory video about the work environment, rights, and responsibilities (including information on the rights and obligations of government employees);
3. Legislation Related to the Operations of the Icelandic Coast Guard; The Act on the Icelandic Coast Guard; The Act on the Rights and Obligations of Government Employees;
4. Policies and Regulations; ICG Human Resources Policy; ICG Gender Equality Plan; ICG Code of Ethics; ICG Policy and Response Plan Against Bullying, Violence, and Harassment in the Workplace; ICG Rules on Insignia and Uniforms; ICG Environmental and Climate Policy 2024–2026; Procedural Rules on Uniform Composition 2025 (in development).
5. Introduction to the Legal Framework and Rules of Conduct; Nine sub-sections (videos) covering, among other things, the rights and responsibilities of government employees, the code of ethics, and confidentiality obligations.

⁸ 1. General introductory material ; 2. A presentation from the Human Resources Division, focusing specifically on the rights and responsibilities of public sector employees, including ethical rules ; 3. Legislation governing the operations of the ICG, including the Act on the Rights and Obligations of Government Employees ; 4. Policies and regulatory framework, including the Coast Guard Code of Ethics and its Policy and Response Plan against Workplace Bullying, Violence, and Harassment ; 5. Legal environment and operational guidelines, with deeper focus on the legal framework, including ethical rules, confidentiality obligations, and the rights and responsibilities of government employees.

employees, but the number could be higher, as Coast Guard vessel crew members often complete the training under a single registration.

29. GRECO takes note of the information provided by the authorities. It notes with satisfaction that ethics and integrity now feature prominently in the training programmes offered to newly recruited police employees, as well as those already on the job, including in specific training sessions on police operations. It also welcomes that such training is regularly organised by the Police, as well as by the University of Akureyri. Finally, GRECO also welcomes the Coast Guard's efforts to strengthen its training programme on ethics and integrity for staff.
30. GRECO concludes that recommendation xii has been implemented satisfactorily.

Recommendation xiii

31. *GRECO recommended that (i) the role of the competence assessment committee in the selection of candidates at all levels be strengthened and that integrity checks be included in the recruitment process and periodically used (ii) vacancies as a rule be advertised and filled following a selection process based on clear criteria.*
32. GRECO recalls that this recommendation remained partly implemented in the Addendum to the Second Compliance Report. The second part of the recommendation was considered complied with. With regard to the first part of the recommendation, GRECO noted that the involvement of selection committees in recruitment was optional, and police chiefs were not required to justify decisions to bypass them. The proportion of recruitment decisions made solely by police chiefs was unknown. GRECO also noted that a new procedure introducing broader integrity checks was expected to be in place by the second quarter of 2024. Overall, more evidence was needed to confirm the regular use of selection committees and broader integrity checks in police recruitment.
33. The authorities of Iceland now report that recruitments for nearly all police vacancies, including both police officers and civil staff, are carried out through *ad hoc* selection committees.⁹ These committees generally consist of three members whose task is to conduct a merit-based assessment of each candidate. While the committee's assessment is advisory, in the vast majority of cases the recommended candidate is hired. The authorities also indicate that the Integrity Review Policy Document has been implemented by the National Commissioner for the Police and is applied in the recruitment of officers and staff, as well as in regular integrity checks.
34. GRECO takes note of the information submitted by the authorities and welcomes that, since the introduction of *ad hoc* selection committees in recruitment procedures, the

⁹ According to major police districts, the rate of *ad hoc* selection committees used for filling vacancies in the last 12 months was as follows:

- The NCIP: An *ad hoc* selection committee has been used for all vacancies.
- The Metropolitan Police in Reykjavík: An *ad hoc* selection committee was used in 13 of 14 hirings.
- The Sudurnes Peninsula Police: *Ad hoc* selection committees were used in all hirings.
- The South Iceland Police: Of the 8 hirings where there was more than one applicant for a vacancy, an *ad hoc* selection committee was used.
- The North Iceland Police: *Ad hoc* selection committees were used in all hirings.
- The District Prosecutor's Office: *Ad hoc* selection committees were used in all 10 hirings

vast majority of such procedures appear to be conducted through these committees, according to the data from major police districts. GRECO is also satisfied to learn that integrity checks are being carried out based on the Integrity Review Policy Document. In light of the progress made, GRECO considers that both parts of this recommendation have been complied with.

35. GRECO concludes that recommendation xiii has been implemented satisfactorily.

Recommendation xiv

36. *GRECO recommended that clear, fair and transparent criteria, based on merit, be introduced for the non-renewing of contracts for law enforcement officers as well as clear appeal possibilities to challenge such decisions.*
37. It is recalled that this recommendation remained not implemented in the Addendum to the Second Compliance Report. GRECO noted that a working group under the National Commissioner of the Police was developing specific procedures for reappointments and non-renewal of contracts, expected by the last quarter of 2024. However, this work had not been completed at the time. Furthermore, the Operating Procedures on Police Recruitment did not address the risks and vulnerabilities in law enforcement careers identified in the Evaluation Report,¹⁰ and no other tangible measures had been taken to address the underlying concerns in this recommendation.
38. The authorities of Iceland submit that specific procedures for reappointments and non-renewal of contracts within the police are still under development and are expected to be issued later in 2025.
39. GRECO takes note of the information submitted by the authorities. It regrets that no tangible progress has been made in implementing this recommendation since the adoption of the Evaluation Report over seven years ago. GRECO encourages the authorities to establish clear, fair and transparent criteria for the non-renewal of contracts of police officers, and to introduce appeal possibilities against such decisions without further delay.
40. GRECO concludes that recommendation xiv remains not implemented.

Recommendation xv

41. *GRECO recommended that robust sets of rules be elaborated for the Police and for the Icelandic Coast Guard concerning the acceptance of gifts, hospitality and other benefits.*
42. It is recalled that this recommendation remained partly implemented in the Addendum to the Second Compliance Report. While rules on gifts had been adopted for the Police, determining when gifts and other favours may be accepted or should be declined, GRECO called for similar rules to be adopted for the Coast Guard, along with measures to ensure their effective implementation in practice.

¹⁰ In particular, paragraph 167 of the Fourth Round Evaluation Report reads as follows: "The GET considers that this system of perpetual renewal of contracts, combined with risks of political influence in appointments, generates excessive vulnerabilities in the career of law enforcement officials."

43. The authorities of Iceland report that in June 2024, the Rules on Gifts for the Icelandic Coast Guard were made public. These Rules apply to all staff of the Coast Guard and aim at providing employees with clear criteria and guidance with regard to the acceptance of gifts, concessions and discounts. According to the Rules, Coast Guard staff are prohibited from using their position to obtain personal favours that could be perceived as influencing the processing, actions or decisions related to Coast Guard activities. They cover any kind of gifts, trips, accommodation, refreshments, discounts, loans or other favours. The Rules allow an exception for personal gifts as a recognition for individual projects, with their value not exceeding 15 000 Icelandic Krona (approximately €104), as well as ceremonial gifts (flowers, souvenirs), as long as they can be considered as modest and reasonable.¹¹ The Director of the Coast Guard is responsible for ensuring compliance with the Rules and any violations may lead to written complaints or reprimands.
44. GRECO takes note of the information submitted by the authorities. It welcomes the adoption of the Rules and guidelines for gifts and other benefits in connection with the activities of the Icelandic Coast Guard. GRECO notes with satisfaction that the Rules cover not only gifts *per se*, but also a broad range of other services and advantages, providing guidance and an enforcement mechanism. With rules on gifts already in place for the Police, GRECO considers that the requirements of this recommendation have been met.
45. GRECO concludes that recommendation xv has been implemented satisfactorily.

Recommendation xvi

46. *GRECO recommended that a study be conducted on the practice of parallel or post-employment activities of law enforcement officers and in the light of the results, to adopt a stricter framework which would limit risks of conflicts of interest.*
47. GRECO recalls that this recommendation remained partly implemented in the Addendum to the Second Compliance Report. GRECO took note of an informal review by the National Commissioner of possible risks of conflicts of interest once police officers leave office. However, GRECO took the view that a verification of notifications by the National Commissioner could not be regarded as the study it had recommended. Further, the absence of any safeguards to prevent conflict-of-interest risks regarding post-employment activities of former police officers remained a source of concern.
48. The authorities of Iceland now report that, following the information review of 2023, the National Commissioner published, on 20 May 2025, the “*Review of Postemployment Practices among Icelandic Police Officers: Ethical and Institutional Implications*”. The Review covers the period of 2012 to 2017 and looks into occupational paths of 128 former police employees, who had left the police force during that period. According to its findings, most police officers (97 out of 128) retired. The remaining small number transitioned into diverse post-employment functions, spanning the public, private, and non-profit sectors. No former officers were identified as being employed in positions

¹¹ In case of any doubt regarding acceptance of a gift or other concession, the staff member in question must consult his/her supervisor.

that would, on the surface, constitute an overt breach of the Police Code of Ethics. According to the authorities, the Commissioner intends to analyse the results of this study further, with the view to conducting a more detailed qualitative investigation to determine whether any legislative amendments are needed to restrict post-employment activities of law enforcement officers.

49. Further, the authorities indicate that all employees of the Police sign a confidentiality agreement, which is to be observed both during and after employment period.¹² Finally, the authorities report that to minimise the risk of conflict of interests for former police officers, the Code of Conduct has been updated with a specific provision¹³ highlighting their legal and contractual obligation of confidentiality, which remains effective after they leave the Police. Any breach of in this regard may be subject to sanctions according to the Civil Servant Act, or may constitute a criminal offence, under Article 136 of the General Penal Code.
50. GRECO takes note of the information submitted by the authorities. It notes with satisfaction that a review of post-employment occupations of former Icelandic Police officers, covering the period of 2012-2017, has been conducted and published by the National Commissioner of Police. The results of the Review demonstrated its relevance and usefulness for better understanding the integrity risks that may appear in this regard. In particular, GRECO refers to a case highlighted in the Review, where a private security company, set up and operated by former police officers around 2012, has allegedly been involved in covert surveillance, intelligence gathering and other activities in the interest of corporate clients.¹⁴ GRECO points to some of the conclusions of the Review, which suggest that a stricter institutional framework for managing post-employment and parallel activities of [former] police officers is needed to effectively limit risks of conflicts of interest,¹⁵ in line with the rationale behind this recommendation.¹⁶ For the time being, no such framework has been introduced.
51. GRECO concludes that recommendation xvi remains partly implemented.

Recommendation xvii

52. *GRECO recommended that (i) a central unit be established or designated within the police structure to deal with internal supervision and inquiries, under the responsibility of the National Police Commissioner who should have in practice a clear leadership for*

¹² The authorities also indicate that, according to Article 22 of the Police Act no. 90/1996 and the Public Administration Act No. 37/1993, all police staff have a duty of confidentiality, which continues to apply after they leave the police service.

¹³ According to the authorities, this provision specifically prohibits using confidential information or knowledge obtained in their role as police staff for another activity.

¹⁴ These reports came to light in 2025 and triggered a wide-ranging review of ethical safeguards and accountability mechanisms in the Police.

¹⁵ The Review concludes, in particular, that “the current ethical framework places a strong emphasis on individual responsibility and post-facto enforcement, rather than proactive institutional oversight. There appears to be no formalised vetting or notification process for former officers entering private security or politically sensitive roles, nor a mechanism for periodic assessment of ethical risks arising from their employment trajectories.”

¹⁶ Paragraph 181 of the Evaluation Report refers to “significant movements to the private sector given the absence of “revolving doors” limitations and related cooling-off periods”, as well as “cases in which former officers of law enforcement agencies started to work in companies or do business linked to their previous job in the police.”

internal policies, including on integrity, and risk management and supervision; and (ii) the chain of command be reviewed to ensure the effective implementation of such policies, without ministerial and political interference.

53. It is recalled that this recommendation remained partly implemented in the Addendum to the Second Compliance Report. GRECO welcomed the practical steps taken by the National Commissioner to strengthen ethics and integrity in the Police and noted that a proposal had been submitted to Parliament to further strengthen internal control through the establishment of a dedicated unit under the National Commissioner. GRECO also noted that legislative amendments had been submitted to Parliament to ensure the effective implementation of internal policies without ministerial and political interference in the Police, but these had not been adopted at the time.
54. The authorities of Iceland now report that following the enactment of the Regulation on the National Commissioner for Police, the role of this office as a central coordinating authority within Icelandic law enforcement has increased.¹⁷ Moreover, following an administrative audit, draft amendments to the Police Act were adopted by Parliament in June 2024,¹⁸ providing for the establishment of an independent internal quality control unit (Police Quality Manager).¹⁹ According to the amendments, the role of the Police Quality Manager is to promote better law enforcement and to carry out supervision that ensures that the Police perform their duties in accordance with existing laws, regulation and procedures. The newly adopted amendments also specify that the Police Quality Manager *“shall be independent in the performance of his duties”*. Police commissioners, including the National Commissioner, are obliged to provide the Quality Manager with the information necessary to perform his/her duties. The authorities indicate that the Police Quality Manager is expected to be appointed during 2025.
55. The authorities conclude that, following the establishment of the Police Council²⁰ in 2020,²¹ the enactment of the regulation on the National Commissioner for Police, and the 2024 amendments to the Police Act,²² the chain of command has been made clear

¹⁷ Since the enactment of the regulation, the National Commissioner has issued new codes of conduct, rules for whistleblowing protection, the Integrity Review Policy Document, as well as procedural rules on the provision of files and documents to the Police Supervisory Committee.

¹⁸ The text of the Police Act No. 90, as amended, is accessible via the following link (in English): <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjoneWx-bWPAxUlgf0HHdJyEEMQFnoECBoQAQ&url=https%3A%2F%2Fwww.govtment.is%2Flibrary%2F04-Legislation%2FPolice%2520Act%2520no.%252090-1996.pdf&usg=AOvVaw0XIMOKmz3iCUNhTvMFrYxW&opi=89978449>

¹⁹ The Police Quality Manager is appointed by the Minister of Justice for a period of five years and is independent from any other functions within the National Commissioner’s Office.

²⁰ The authorities reiterate key responsibilities of the Police Council, which include coordinating police operations across jurisdictions, advising the Minister of Justice and other authorities on police matters, promoting collaboration between different police districts and discussing policy matters, strategic planning, and resource allocation.

²¹ The Police Council, established in 2020, operates in accordance with Article 6 a. of the Police Act No. 90/1996. Its main role is to serve as a coordinating and consultative body for matters concerning police operations across the country. The Police Council is chaired by the National Commissioner of Police and includes as members the District Commissioners of Police as well as the District Prosecutor. The Police Council convenes regularly to ensure consistent, efficient, and uniform application of police policy nationwide.

²² According to the authorities, the purpose of these amendments included establishing independent internal controls within the police to ensure the effective implementation of policies and internal controls within all police bodies.

and ensures the effective implementation of the recommended policies and internal controls.

56. GRECO takes note of the information provided by the authorities. It welcomes the adoption of amendments to the Police Act in 2024, which establish a new function of the Police Quality Manager, yet to be appointed. GRECO notes that while the appointment of the Police Quality Manager is at the Minister's discretion, the five-year tenure is guaranteed by law, which also stipulates that the Police Quality Manager is to be independent in the performance of his/her duties. In view of the progress made in the implementation of this recommendation, GRECO considers that its objectives have been achieved.
57. GRECO concludes that recommendation xvii has been implemented satisfactorily.

III. CONCLUSIONS

58. In view of the foregoing, GRECO concludes that Iceland has implemented satisfactorily or dealt with in a satisfactory manner thirteen of the eighteen recommendations contained in the Fifth Round Evaluation Report. Of the remaining five recommendations, four have been partly implemented and one has not been implemented.
59. More specifically, recommendations i, iii-viii, x, xii, xiii, xv, xvii and xviii have been implemented satisfactorily or dealt with in a satisfactory manner, recommendations ii, ix, xi and xvi have been partly implemented, and recommendation xiv has not been implemented.
60. With respect to persons entrusted with top executive functions (PTEFs), GRECO acknowledges the progress Iceland has made over the years. Overall, seven out of nine recommendations from this section have been implemented satisfactorily, and the remaining two have been partly implemented. In particular, the Act on Conflicts of Interest in the Government Offices, covering PTEFs, has been adopted, the relevant Codes of Ethics have been revised, and a range of measures have been taken to raise awareness of integrity rules among various categories of public officials, including through more regular training. Further, confidential counselling on integrity matters has been made available to PTEFs; guidelines for interaction with lobbyists and other third parties aiming to influence the decision-making have been adopted, and rules on the submission of declarations of financial interests by PTEFs have been introduced. That said, breaches of integrity rules by PTEFs, or failures to comply with their declaratory obligations, are still not subject to any sanctions, and accountability regarding this area remains limited to "political responsibility".
61. As regards law enforcement agencies, considerable progress has been made in several areas, in line with the recommendations. The role and competences of the National Commissioner for Police have been enhanced through new regulation. Following this, the National Commissioner adopted a comprehensive Integrity Review Policy to safeguard and promote integrity, set out principles for transparent recruitment, and introduced detailed rules and procedures for the protection of whistleblowers in the Police. New rules have been adopted to ensure that Police vacancies are advertised, and

the recruitment process is now more consistent, regularly involving selection committees. Codes of Conduct for the Police and the Coast Guard have been revised, and rules on gifts have been enacted for both bodies. A revamped training programme on ethics and integrity is now being implemented for the Police and Coast Guard staff. A review of post-employment activities of Police officers has been conducted, showing the need for a more robust framework to manage conflicts of interest risks. However, this process has not yet been completed, as no new risk-management measures have been adopted in this area. Furthermore, a new position of the Police Quality Manager, responsible for the internal quality control of police work, has been introduced. However, no progress has been made in introducing clear, fair and transparent merit-based criteria for the non-renewal of police contracts, nor in establishing appeal possibilities against such decisions.

62. In accordance with Rule 31 revised bis, paragraph 10 of GRECO's Rules of Procedure, the adoption of this Second Addendum to the Second Compliance Report terminates the Fifth Round compliance procedure with respect to Iceland. The authorities of Iceland may, however, wish to inform GRECO of the developments concerning the implementation of recommendations ii, ix, xi, xiv and xvi, which remain incomplete.
63. Finally, GRECO invites the authorities of Iceland to authorise, as soon as possible, the publication of the report, to translate it into the national language and to make the translation public.